

UK MODERN SLAVERY ACT 2015 (“ACT”)

Statement of policy from Brand Energy & Infrastructure Services UK, Ltd. (trading as “Brand”)

This statement is made in accordance with Section 54, Part 6 of the UK Modern Slavery Act 2015 and sets out the steps the Company takes to ensure slavery and human trafficking is not taking place in our supply chains or any part of our business.

Introduction

Brand Energy & Infrastructure Services UK, Ltd (“Brand”, “the Company”) recognises that it has a responsibility to take a robust approach to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational Overview

This statement covers the activities of Brand Energy & Infrastructure Services UK, Ltd. The Company provides integrated specialty services to the global energy, industrial, and infrastructure markets.

Brand Supply Chain

Brand has a direct relationship with many end manufacturers of equipment, and a two or three tier down relationship with suppliers of other direct and indirect materials, goods, services and labour.

Brand purchases from a number of sources, many with UK companies which is preferable for the management of processes and policies, but a number of suppliers are located internationally. As a result, Brand are fully committed to robust contract conditions, compliance checks and audits to provide a 360 overview of a suppliers’ activities.

The ultimate responsibility to manage the process of respecting human rights and the covenants within the Modern Slavery Act are imposed onto our supply chain through various mechanisms.

- › As part of the Procurement Process a Risk Map identifies the areas which require more dynamic reviews. Brand work with our Supply Chain partners to ensure full understanding of their responsibilities.
- › All Supply Chain partners, and their direct supply chain are asked to sign onto BrandSafway Code of Conduct, and the appendix Supplier Code of Conduct, is applicable for any company supplying goods or services. <https://www.beis.com/uk/legal/compliance-statements>
- › Due diligence forms part of the Brand accreditation process, these documents set out the standards of not only HSE and Quality but also include, Sustainability and Ethics including the use of labour and adherence to relevant country legal requirements.
- › Contracts are reviewed to ensure under the Ethics section, that the supplier should ensure as much as possible that Slavery and Trafficking are not taking place in their own sub supply chain.
- › Regular Audits take place at high risk manufacturers located outside the UK/EU to ensure no persons working within their facilities are subject to mistreatment, have safe and fair working conditions, receive the minimum wage for the country of work and have adherence to the countries legal working practices. Brand ask them to look at the risks within their own supply chain as part of the initial and ongoing accreditation process. The Company expect that these suppliers can demonstrate active management through the use of policies and procedures that they are complying.

The Employment of Brand Personnel in the UK

Brand carries out right to work checks on all its staff in line with government regulations. These checks are designed to ensure all direct employees of The Company have the right to work in the UK.

Brand ensures that UK workers receive minimum wage by undertaking regular reviews of contracts and conditions.

Labour agency contracts receive regular reviews to ensure they comply and are actively monitored and audited.

Relevant Policies

The Company operates the following policies to support its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- › Employee code of conduct. BrandSafway's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The Company strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- › Ethical Hotline. Brand encourages all its employees to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. It is designed to make it easy for workers to make disclosures, without fear of retaliation.

Training and Compliance

Brand conducts electronic and face to face training for employees to emphasise the importance of acting with integrity and in line with our own internal Ethical Business Code. Compliance officers incorporate guidance regarding the Modern Slavery Act into training and induction sessions.

Further Information

Below is a list of useful links to resources, guides and information Brand strongly encourages all of its suppliers to refer to ensure they are fully informed about the Modern Slavery Act 2015.

- <https://www.gov.uk/government/publications/stopping-modern-slavery-in-business-video>
- <https://www.gov.uk/government/publications/modern-slavery-industry-factsheets>
- <https://www.gov.uk/government/publications/support-for-victims-of-human-trafficking>
- <https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

Approval



Mick Herke

Vice President - International Industrial, Energy and Commercial (IEC)

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UK Business Units



Brand
Industrial & Offshore

John Simpson

UK Managing Director



Hünnebeck
Forming & Shoring

Wayne Fisher

UK Managing Director



Lyndon SGB | Taylor's Hoists
Commercial Services

Stuart Robinson

UK Managing Director

